SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT

PART A – JUSTIFICATION

This is a justification for the Department of Labor's request for approval to establish a new data validation requirement for the Employment and Training Administration's (ETA) employment and training programs. Data validation will assess the accuracy of data collected and reported to ETA on program activities and outcomes. The accuracy and reliability of program reports submitted by states and grantees using Federal funds are fundamental elements of good public administration, and are necessary tools for maintaining and demonstrating system integrity. The data validation requirement for employment and training programs will strengthen the workforce system by ensuring that accurate and reliable information on program activities and outcomes is available. The following programs will be subject to the data validation requirement: Workforce Investment Act Title (WIA) IB, Labor Exchange, Trade Adjustment Assistance (TAA), Migrant and Seasonal Farmworkers (MSFW), Native American Employment and Training, and Senior Community Service Employment Program (SCSEP).

1. Reasons for Data Collection

States and grantees receiving funding under WIA Title IB, Wagner-Peyser Act, TAA, and SCSEP are required to maintain and report accurate program and financial information [See Citations in Appendix 1: WIA Section 185 (29 USC 2935) and WIA Regulations 20 CFR 667.300(e)(2), Wagner-Peyser Act Section 10 (29 USC 49i), Older Americans Act Section 503(f)(3) and (4) (42 USC 3056a (f)(3) and (4)), and TAA Regulations 20 CFR 617.57]. Further, all states and grantees receiving funding from ETA and the Veterans' Employment and Training Service are required to submit reports or participant records and attest to the accuracy of these reports and records.

In 2001, the President announced a Management Agenda to improve the management and performance of the Federal government. One of the five government-wide goals – budget and performance integration – emphasizes the importance of complete information for program monitoring and improving program results.

The Department's Office of Inspector General (OIG) conducted an audit of WIA performance data oversight from July 2000 through October 2001. The audit, released in September 2002, found that, "Because of insufficient local, state, and Federal oversight, the Employment and Training Administration (ETA) has little assurance that the state-reported WIA performance outcomes data are either accurate or verifiable." The OIG recommended that states should validate reported data using a statistically valid sampling method. To address the concerns raised by the OIG and to meet the Agency's goal for accurate and reliable data, ETA committed to the development and implementation of a data validation requirement in order to ensure the accuracy of data collected and reported on program activities and outcomes.

Through contract support, ETA has developed a process for validating data submitted by states and grantees. Data validation consists of two parts:

1) **Report validation** evaluates the validity of aggregate reports submitted to ETA by checking the accuracy of the reporting software used to calculate the reports. Report validation is accomplished by processing an entire file of participant records into validation counts and comparing the validation counts to those reported by the state or grantee.

2) **Data element validation** assesses the accuracy of participant data records. Data element validation is performed by reviewing samples of participant records against source documentation to ensure compliance with Federal definitions.

Since there are two basic sources of reporting error, both parts are necessary to ensure the validity of information reported to ETA. First, if the data collected is incorrect or data entry errors occur, then the outcome information will not be accurate. Second, even if the data collected is correct, if the state's or grantee's reporting system does not meet Federal standards, it could calculate the performance outcomes incorrectly.

ETA has developed a set of validation tools discussed below – software, instructional handbooks, and user guides – that states and grantees can use to validate data. Two states – Washington and Texas – participated in a pilot test of the validation process in the summer and fall of 2002 using the ETA validation tools. The pilot states conducted validation for the WIA Title IB, Labor Exchange, and TAA programs. The states received preparatory training prior to beginning validation and technical assistance throughout the pilot from ETA's validation contractor. Grantees in the MSFW program, Native American Employment and Training program, and SCSEP will begin pilot tests by the end of CY 2003.

In brief, the pilot test indicated the following:
- States and grantees will generally be able to conduct data validation with a reasonable but sustained level of effort.
- The validation process allows states and grantees to identify and address reporting errors.
- States and grantees do make reporting errors which need detecting and fixing.
- The average staff requirements for a state to complete validation for the WIA Title IB, Labor Exchange, and TAA programs will be about 882 hours per year (or less than 1/2 of a staff year). The average annual time required by grantees operating MSFW programs, Native American Employment and Training programs, and SCSEP to complete validation is approximately 102 hours (or about 1/20 of a staff year). Startup activities will require an additional 264 hours on average per state and 74 hours on average per grantee in the initial year of validation.

On the basis of a successful pilot test, ETA wishes to implement the data validation requirement for employment and training programs. In order to ensure the accuracy of reported information throughout the workforce investment system, states and grantees will be required to conduct data validation. To avoid over burdening states and grantees, data validation will be required annually as follows:

- **Report validation** must be completed prior to the submission of required reports to ETA.

- **Data element validation** must be completed within 120 days after required annual reports or participant records are submitted to ETA. Exact deadlines for the completion of data validation will vary somewhat by program.

- States and grantees will be required to send validation output reports to ETA within 120 days after the submission of required annual reports or participant records.

State and grantees operating ETA programs subject to the data validation requirement will validate the following reports and participant records as follows:

Program	Report/Records	OMB Approval No.	Expiration Date
Workforce Investment Act Title IB	Annual Report (ETA 9091)	1205-0420	8/05
Labor Exchange	ETA 9002, VETS 200	1205-0240	4/05
Trade Adjustment Assistance	TAPR	1205-0439	12/03
Migrant and Seasonal Farmworkers	WIASPR	1205-0425	12/04
Native American Employment and Training	ETA 9085 (annual report) ETA 9084 (annual report)	1205-0422	3/04
Senior Community Service Employment Program	ETA 5140 (annual report)	1205-0040	12/03

Appendix 2 provides a more detailed overview of the validation process. A copy of Training and Employment Guidance Letter No. 3-03, which outlines ETA's data validation policy, is included in Appendix 3. While TEGL 3-03 establishes ETA's data validation policy, the Agency is waiting for OMB approval prior to establishing requirements for the submission of information on data validity.

2. Purpose of Information Collection

ETA will use data validation results to evaluate the accuracy of data collected and reported to ETA on program activities and outcomes. This information collection will enable ETA to assure its customers, partners, and stakeholders of the validity of performance data which underlie the workforce accountability system. Further, data validation will ensure that performance information used to direct incentives and sanctions and to meet Government and Performance and Results Act responsibilities are accurate.

Data validation was also developed with the goal of assisting states and grantees to provide more accurate data. Validation allows states and grantees to detect and identify specific problems with their reporting processes, including software and data issues, and to enable them to correct the problems. In addition, the tools developed by ETA will help states and grantees analyze the causes of performance successes and failures by displaying participant data organized by performance outcomes.

For data validation to be effective and to allow for continuous improvement, ETA will establish acceptable levels for the accuracy of reports and data elements. These accuracy standards will be established in phases. The initial validation year will focus on detecting and resolving any issues with state and grantee data and reporting systems. Error rates collected in the second year will be analyzed, and, based on this information, standards for accuracy will be established prior to the third year of validation.

Once accuracy standards are established, states and grantees will be held accountable for meeting those standards and will be required to address any issues concerning data accuracy. States and grantees that fail to meet accuracy standards will receive technical assistance from ETA and will develop and implement a corrective action plan. Data that does not meet accuracy standards will not be acceptable for measuring performance, and may keep the state or grantee from being eligible for incentives that are awarded based on performance data. Significant or unresolved deviation from accuracy standards may be deemed a failure to report.

3. Technology and Obstacles Affecting Reporting Burden

ETA has developed standardized software, instructional handbooks, and user guides that states and grantees can use to perform data validation:

- **Software** developed by ETA generates samples, worksheets, and reports on data accuracy. For report validation, the software will validate the accuracy of aggregate reports that are generated by the state's or grantee's reporting software and will produce an error rate for each reported count. The software can also be used to generate the aggregate information required in reports submitted to ETA. For data element validation, the software generates a sample of the participant records and data elements for the state or grantee to validate. The software produces worksheets on which the validator records information after checking the source documentation in the sampled case files. The software calculates error rates for each data element, with confidence intervals of 3.5 percent for large states/grantees and 4 percent for small states/grantees.

- **Handbooks** provide detailed information on the validation methodology, including sampling specifications and data element validation instructions for each data element to be validated.

- **User guides** developed for each ETA validation software application lead states and grantees through the process of installing the application, building and loading a validation file, and completing report and data element validation.

Most of the states and grantees will use the software provided by ETA to perform validation. States and grantees may use an alternative methodology and tools as long as the methodology meets criteria for sampling and confidence intervals. States or grantees that do not use the validation tools provided by ETA will be required to document that the alternative methodology is statistically valid.

As mentioned above, the ETA software can be used to generate the aggregate information required in reports submitted to ETA. States or grantees that use the software provided by ETA to generate this aggregate information will not be required to perform report validation.

ETA's validation handbooks and user guides for each program can be found in Appendix 4. The data validation handbooks and user guides will show the following approval information:

- **OMB Approval**. The reporting requirements for these advances are approved by OMB according to the Paperwork Reduction Act of 1995 under OMB approval No. XXXX to expire _____ . NOTE: Persons are not required to respond to this collection of information unless it displays a currently valid OMB control number.

- **Disclosure Statement**. Public reporting burden for this collection of information is estimated to average 882 hours per state per year and 102 hours per grantee per year. This estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection, including suggestions for reducing this burden, to U.S. Department of Labor, Employment and Training Administration, Performance and Results Office, Room N-5309, 200 Constitution Avenue, NW, Washington, DC 20210 (Paperwork Reduction Project XXXX).

States and grantees will record the results of their validation on spreadsheet software prepared as an accompaniment to their handbooks. Initially, the spreadsheets can be transmitted by e-mail to ETA. Eventually, in order to comply with the Government Paperwork Elimination Act, the results will be submitted via the system now used for electronic transmission of reports to ETA.

ETA knows of no technical obstacles to implementing and operating data validation.

4. Duplication

The proposed data validation requirement does not duplicate any existing ETA program.

5. Burden on Small Business or Other Small Entities

While data validation will mostly be performed by state governments and large private non-profit organizations, some small entities will be required to conduct validation. Some of the grantees operating MSFW and Native American Employment programs are small private non-profit organizations providing services to a low number of individuals. However, this information collection will not have a significant economic impact on a substantial number of small entities as indicated in Item 5 on OMB 83-I.

ETA has taken a number of steps to minimize the burden to states and grantees of performing validation:

- ETA has developed tools – standardized software, handbooks, and user guides – that grantees and states can use to perform validation. Therefore, states and grantees do not have to invest resources into developing validation tools.
- States and grantees can obtain technical assistance on validation procedures and the use of the validation tools from ETA's data validation contractor.
- The data element validation process allows states and grantees to select appropriate validation samples necessary to compute statistically significant error rates, rather than requiring the validation of every participant case file.
- To reduce the relative burden on smaller states and grantees as much as possible, the sample size for smaller entities is set to yield a less precise error rate than that for larger grantees and states.
- ETA will phase in standards for the accuracy of data, to allow states and grantees the opportunity to resolve issues with their data and reporting systems.

6. Consequences of Failure to Collect Data

As mentioned in Section 1, ETA has been criticized for a lack of monitoring that has led to an inability to assure the validity of performance outcomes reported by states and grantees. The proposed data validation requirement will allow ETA to respond positively to those criticisms. If data validation is not implemented, ETA will not be able to ensure that critical data used for performance reports, to direct incentives and sanctions, to meet Government and Performance and Results Act responsibilities, and for other management purposes are reliable.

7. Special Circumstances Involved in Collection of Data Validation Information

This request is consistent with 5 CFR 1320.5.

8. Pre-Clearance Notice and Responses

A Pre-clearance Notice will be published in the Federal Register on _____ (Vol. ___ , No. ___ , Pages __ thru __ , Date). A copy of the notice can be found in Appendix 5. Following the 60-day comment period, public comments will be summarized and included in the Supporting Statement. The name and contact information of the reviewer at the Bureau of Labor Statistics will be included in the final package.

9. Payments to Respondents

This program does not involve payments per se to respondents. However, ETA provides funding to the participating states and grantees, which are technically listed as the "respondents" for purposes of the Paperwork Reduction Act. The requirement to perform validation derives from states' and grantees' responsibility to provide accurate information on program activities and outcomes to ETA. States and grantees are expected to provide resources for conducting validation from their administrative funds. Validation of program performance is a basic responsibility of grantees, who are required to report program performance, under Department of Labor regulations (29 CFR 95.51 and 97.40).

ETA has taken a number of steps to minimize the resources needed for data validation, as outlined in Section 5. The estimates in Section 12 indicate that annual staff requirements for continuing operations of data validation will be on average 882 hours (or less than 1/2 of a staff year) for a state and 102 hours (or about 1/20 of a staff year) for a grantee.

10. Confidentiality

Confidentiality is not an issue with data validation, which simply involves verifying the accuracy of aggregate reports and participant records submitted earlier as required by ETA.

11. Questions of a Sensitive Nature

The data collection includes no questions of a sensitive nature.

12. Respondent Annual Burden

The following estimates of the hours and cost required to perform annual validation are based on pilot tests conducted by two states in the summer and fall of 2002. Data validation is estimated to require an annual burden of 73,562 hours and $2,015,000 for all six programs subject to the validation requirement.

Burden estimates for state programs – WIA Title IB, Labor Exchange and TAA – are included in Section 12-A. Burden estimates for grantee programs – MSFW, Native American Employment and Training, and SCSEP – are outlined in Section 12-B. Estimates of the hours and cost necessary to complete startup activities in the initial year of validation are addressed in Section 13.

A. State Programs: WIA Title IB, Labor Exchange, and TAA

Table 1 indicates that the annual hours needed to perform validation for the WIA Title IB, Labor Exchange, and TAA programs is 882 hours on average per state and 46,732 hours for all states. The annual cost of performing validation for these programs is $28,656 on average per state and $1,518,791 for all states.

Table 1 - Calculation of Combined Annual Burden for WIA Title IB, Labor Exchange, and TAA

	No. of States	Hours	Rate in $/hr	Cost
Large State	18	1,332	$32.50	$43,297
Medium State	18	836	$32.50	$27,180
Small State	17	453	$32.50	$14,718
All States Total	53	46,732	$32.50	$1,518,791
Average per State	--	882	$32.50	$28,656

- The calculation of the hours required to perform validation includes the time for validators to review sampled case files (40 minutes per file), the travel time to local offices to review the files, and 15% of a supervisor's time.
- States have been divided into three categories – large, medium, and small – based on the number of participants that exit a state's program in a year. The size of the state impacts the number of sampled case files that must be reviewed and the travel time to local offices.
- The travel time per office is estimated as 8 hours for large states, 6 hours for medium states, and 3 hours for small states.
- The estimate of burden is based on the assumption that states will perform data element validation separately for the WIA Title IB and TAA programs. If states perform data element validation for both programs at the same time, the travel time required to perform validation will decrease. As a result, the burden would be reduced by approximately 160 hours for large states, 60 hours for medium states, and 21 hours for small states.
- The hourly rate is the estimated average hourly earnings for employees in state Unemployment Insurance (UI) agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes).

B. Grantee Programs: MSFW, Native American Employment and Training, and SCSEP

Table 2 provides an overview of the annual burden for the MSFW program, Native American Employment and Training program, and SCSEP, and average hours and cost across grantees in all three programs. The annual hours needed to perform validation for a grantee operating one of these programs is 102 hours on average per grantee and 26,830 hours for all grantees. The annual cost of performing validation is $1,878 on average per grantee and $495,767 for all grantees.

Table 2 - Calculation of Annual Burden for
MSFW, Native American Employment and Training, and SCSEP

	No. of Grantees	Hours	Rate in $/hr	Cost
MSFW Grantee	52	158	$10.75/$32.50	$1,896
Native American Employment & Training Grantee	144	53	$10.75	$569
SCSEP Grantee	68	162	$10.75/$32.50	$4,637
All Grantees	264	26,830	$10.75/$32.50	$495,767
Average per Grantee	--	102	$10.75/$32.50	$1,878

- The calculation of the hours required to perform validation includes the time for validators to review sampled case files (40 minutes per file) and 15% of a supervisor's time. (Travel is not required for grantees to perform validation).
- The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For state, county, and U.S. territory government grantees, the hourly rate is the estimated average

hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes). For private non-profit grantees and Federally-recognized tribes, the hourly rate is the average hourly earnings in the social assistance industry (May 2003, Current Employment Statistics Survey, U.S. Census Bureau).

Tables 3, 4, and 5 provide a more detailed account of the annual burdens for each grantee program.

Table 3 - Calculation of Annual Burden for MSFW

Type of grantee	No. of Grantees	Hours	Rate in $/hr	Cost
Private Non-Profit	49	158	$10.75	$1,698
State or County Government	3	158	$32.50	$5,133
All Grantees	52	8,212	--	$98,588
Avg. per Grantee	--	158	--	$1,896

Note: The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For state and county government grantees, the hourly rate is the estimated average hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes). For private non-profit grantees, the hourly rate is the average hourly earnings in the social assistance industry (May 2003, Current Employment Statistics Survey, U.S. Census Bureau).

Table 4 - Calculation of Annual Burden for Native American Employment and Training

Type of Grantee	No. of Grantees	Hours	Rate in $/hr	Cost
Private Non-Profit	70	53	$10.75	$569
Federally-Recognized Tribe	74	53	$10.75	$569
All Grantees	144	7,618	--	$81,889
Avg. per Grantee	--	53	--	$569

Note: The hourly rate used to calculate cost is the average hourly wage in the social assistance industry (May 2003, Current Employment Statistics Survey, U.S. Census Bureau).

Table 5 - Calculation of Annual Burden for SCSEP

Type of Grantee	No. of Grantees	Hours	Rate in $/hr	Cost
Private Non-Profit	12	162	$10.75	$1,739
State or U.S. Territory Government	56	162	$32.50	$5,258
All Grantees	68	11,000	--	$315,290
Avg. per Grantee	--	162	--	$4,637

Note: The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For state and U.S. territory government grantees, the hourly rate is the estimated average hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes). For private non-profit grantees, the hourly rate is the average hourly earnings in the social assistance industry (May 2003, Current Employment Statistics Survey, U.S. Census Bureau).

13. Respondent Startup Burden

The following estimates of the hours and cost required to complete necessary startup activities in the initial validation year are based on pilot tests conducted by two states in the summer and fall of 2002. Data validation is estimated to require 33,544 hours and $767,000 for startup activities for all six programs.

Burden estimates for state programs – WIA Title IB, Labor Exchange and TAA – are included in Section 13-A. Burden estimates for grantee programs – MSFW, Native American Employment and Training, and SCSEP – are outlined in Section 13-B.

A. State Programs: WIA Title IB, Labor Exchange, and TAA

Table 6 indicates that startup costs for states in the initial year of validation for the WIA Title IB, Labor Exchange, and TAA programs will be $8,580 on average per state and $454,740 for all states. The hour estimate for the completion of validation startup activities is 264 hours on average per state and 13,992 hours for all states.

Table 6 - Calculation of Combined Startup Burden for WIA Title IB, Labor Exchange, and TAA

	No. of States	Hours	Rate in $/hr [1]	Cost
State	53	264	$32.50	$8,580
All States	53	13,992	$32.50	$454,740

- Startup activities in the initial year of validation include developing an extract file, loading the software application, planning and training, and collating reports.
- The number of hours needed for startup activities are the same for every state, regardless of size.

- The hourly rate is the estimated average hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes).

B. Grantee Programs: MSFW, Native American Employment and Training, and SCSEP

Table 7 provides an overview of the startup burdens for the MSFW program, Native American Employment and Training program, and SCSEP and average hours of burden and cost across grantees in all three programs. The startup cost for grantees operating MSFW programs, Native American Employment and Training programs, and SCSEP is $1,183 on average per grantee and $312,322 for all grantees. The hours necessary to perform validation startup activities are 74 hours on average per grantee and 19,552 hours for all grantees.

**Table 7 - Calculation of Startup Burden for
MSFW, Native American Employment and Training, and SCSEP**

	No. of Grantees	Hours	Rate in $/hr	Cost
MSFW Grantee	52	72	$10.75/$32.50	$864
Native American Employment & Training Grantee	144	72	$10.75	$774
SCSEP Grantee	68	80	$10.75/$32.50	$2,293
All Grantees	264	19,552	$10.75/$32.50	$312,322
Average per Grantee	--	74	$10.75/$32.50	$1,183

- Startup activities in the initial year of validation include developing an extract file, loading the software application, planning and training, and collating reports.
- The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For state, county, and U.S. territory government grantees, the hourly rate is the estimated average hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes). For private non-profit grantees and state- and Federally-recognized tribes, the hourly rate is the average hourly earnings in the social assistance industry (May 2003, Current Employment Statistics Survey, U.S. Census Bureau).

Tables 8, 9, and 10 provide a more detailed account of the startup burdens for each grantee program.

Table 8 - Calculation of Startup Burden for MSFW

Type of grantee	No. of Grantees	Hours	Rate in $/hr	Cost
Private Non-Profit	49	72	$10.75	$774
State or County Government	3	72	$32.50	$2,340
All Grantees	52	3,744	--	$44,946
Avg. per Grantee	--	72	--	$864

Note: The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For state and county government grantees, the hourly rate is the estimated average hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes). For private non-profit grantees, the hourly rate is the average hourly earnings in the social assistance industry (May 2003, Current Employment Statistics Survey, U.S. Census Bureau).

Table 9 - Calculation of Startup Burden for Native American Employment and Training

Type of Grantee	No. of Grantees	Hours	Rate in $/hr	Cost
Private Non-Profit	70	72	$10.75	$774
Federally-Recognized Tribe	74	72	$10.75	$774
All Grantees	144	10,368	--	$111,456
Avg. per Grantee	--	72	--	$774

Note: The hourly rate used to calculate cost is the average hourly wage in the social assistance industry (May 2003, Current Employment Statistics Survey, U.S. Census Bureau).

Table 10 - Calculation of Startup Burden for SCSEP

Type of Grantee	No. of Grantees	Hours	Rate in $/hr	Cost
Private Non-Profit	12	80	$10.75	$860
State or U.S. Territory Government	56	80	$32.50	$2,600
All Grantees	68	5,440	--	$155,920
Avg. per Grantee	--	80	--	$2,293

Note: The hourly rate used to calculate cost depends upon the type of organization receiving the grant. For state and U.S. Territory government grantees, the hourly rate is the estimated average hourly earnings for employees in state UI agencies in FY 2003 (as used for FY 2003 UI budget formulation purposes).

For private non-profit grantees, the hourly rate is the average hourly earnings in the social assistance industry (May 2003, Current Employment Statistics Survey, U.S. Census Bureau).

14. Cost to Federal Government

Federal costs are the staff and contractor costs required to design, implement, and manage data validation as outlined in the table below. As indicated in Table 11, from April 2001 through CY 2004, contractor costs to develop software and other validation tools, provide training to states and grantees, and provide on-going technical assistance to states and grantees will total $3,300,000. Beginning in CY 2005, the cost of contractor support to provide continual technical support to grantees and states and any needed updates to validation tools will be approximately $300,000 per year. Costs for ETA staff to manage the Data Validation program will be $467,588 during the development and implementation phase and $115,727 per year for continuing operations.

Table 11 - Cost of Data Validation to Federal Government

Development and Implementation Phase (4/01-12/04)		Continuing Operations (Per year, beginning in CY 2005)	
Contractor Support	$3,300,000	Contractor Support	$300,000
ETA Staff Total	$467,588	ETA Staff Total	$115,727
1 GS-15 (1/4 time)	$102,329	1 GS-15 (1/8 time)	$13,644
1 GS-14 (1/2 time)	$173,991	1 GS-14 (1/4 time)	$23,199
1 GS-9 (1/4 time)	$42,690	1 GS-13 (1/2 time)	$39,263
6 GS-12 (1/10 time)	$148,578	6 GS-12 (1/10 time)	$39,621
Total Cost	$3,767,588	Total Cost	$415,727

Note: Staff costs are based on the average salaries for Department of Labor grade ranges as of January 2003.

15. Reasons for Program Change and Change in Burden

This is a new information collection request that will require approximately 73,562 hours and $2,015,000 towards ETA's Information Collection Budget (for all 6 programs implementing data validation).

16. Publication Information

ETA intends to publish results of data validation in an annual validation report.

17. Reasons for Not Displaying Date OMB Approval Expires

ETA will display approval information in the ETA validation handbook and user guides.

18. Exceptions to Certification

There are no exceptions to the certification statement in OMB 83-I.